

# **EXHIBIT 8**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
CASE NO. 11-1590-LTS-HBP

UNIVERSITAS EDUCATION, LLC

Plaintiff,

VS.

NOVA GROUP, INC., as trustee,  
sponsor and fiduciary of the  
CHARTER OAK TRUST WELFARE  
BENEFIT PLAN,

Defendant.

April 17, 2013

10:00 a.m.

DEPOSITION OF DANIEL E. CARPENTER

REPORTED BY:

MARY G. VAN DINA, Certified Court Reporter,  
Certified LiveNote Reporter.

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1 Daniel Carpenter 4/17/13

2 it to.

3 Q. To whom have you rented the property?

4 A. A number of employees of USB Group, as  
5 well as Benistar.

6 Q. Why was an LLC formed to take  
7 ownership of the property?

8 A. All of -- anything that I invested in  
9 is either held in an LLC or it's held in a trust,  
10 you know, for either estate planning purposes or  
11 protection, you know, asset protection, you know,  
12 type purposes, so that if something happens on  
13 one property, people can only sue that property  
14 and they cannot sue other properties that are  
15 owned by different trusts or different LLCs.

16 Q. Is part of your motivation also to  
17 avoid being sued personally?

18 A. I've been constantly sued since about  
19 January 6th of 2001, so I've been under a  
20 constant siege of lawsuits since early January of  
21 2001.

22 MR. SIANO: May I have a moment,  
23 please?

24 MS. COLBATH: Sure.

25 (Off-the-record discussion.)